

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MINNESOTA**

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In re: Baycol Products Litigation

UNITED STATES OF AMERICA *ex rel.*  
LAURIE SIMPSON,

Honorable Michael J. Davis  
United States District Court Judge

*Plaintiff,*

v.

BAYER HEALTHCARE  
PHARMACEUTICALS, INC.;  
BAYER CORP.; and  
BAYER A.G.,

MDL No. 1431  
Civil No. 08-5758(MJD)(SER)

*Defendants.*

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**JOINT STATUS REPORT**

In accordance with the Court's January 18, 2019 Order (ECF No. 178), Relator Laurie Simpson ("Relator") and Defendants Bayer Healthcare Pharmaceuticals, Inc., Bayer Corp., and Bayer A.G. ("Bayer") (together, the "Parties"), respectfully submit the following joint status report.

Since the last Joint Status Report on June 18, 2019, the Parties have continued to make progress regarding discovery in this matter. On June 29, 2019, Bayer provided Relator with a replacement copy of one of the CDs from the Baycol MDL Production. The Parties have also been meeting and conferring regarding the custodians, search terms, and date cutoff that Bayer will use to respond to Relator's Second Request for Production of Documents. The Parties have exchanged draft proposals and expect to reach agreement before the next Joint Status Report.

At this time, the Parties do not believe that there are any discovery issues that require the Court's intervention. The Parties are available if the Court wishes to discuss the status of discovery at the conference scheduled for July 23, 2019. However, in light of the foregoing, the Parties believe that the status conference may be postponed until August 27, 2019.

Dated: July 16, 2019

Respectfully submitted,

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Bayer Healthcare Pharmaceuticals, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on July 16, 2019, the foregoing document was served this day on all counsel of record via CM/ECF.

/s/ Caitlin L.D. Hull